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ATTACHMENT 3-4 DTTF TRAINING PLAN

1.0 PERSONNEL TRAINING: 40 CFR 270.14, 264.16; R315-8-2.7

The Dugway Thermal Treatment Facility (DTTF) Training Plan has been developed to ensure that personnel involved with thermal treatment of hazardous wastes at the DTTF range perform their duties according to accepted practices and in compliance with this permit. Personnel identified in this plan must receive sufficient training to ensure that the facility is operated in a manner that will protect human health and the environment.

This training plan covers only Resource Conservation and Recovery Act (RCRA) requirements. Other training requirements, such as those required by Dugway Proving Ground (DPG), the U.S. Army, the Occupational Safety and Health Administration (OSHA), or other agency, are not specifically included in this plan.

The Directorate of Environmental Programs (DEP) is responsible for annual review of this Training Management Plan (40 CFR Part 264.16). Updates of the plan may occur if there is a change involving regulations, waste type, operations, techniques, equipment, or the installation-wide DPG Contingency Plan procedures that affect employee training requirements.

1.1 TRAINING OBJECTIVES: 40 CFR 264.16(a)(1), R315-8-2.7(a)(1)

The objective of all RCRA training is to provide the employee with the information needed to perform tasks in accordance with RCRA regulations. The RCRA training program for DTTF is tailored to address employee duties and the types of wastes handled at that facility.

All personnel who are involved in managing or treating hazardous wastes at the DTTF receive training as specified in this training plan. All employees with responsibilities for DTTF emergency response must understand the procedures detailed in the DTTF Contingency Plan in Attachment 3-7 of this Permit.

1.2 TRAINING DIRECTOR: 40 CFR 264.16(a)(2); R315-8-2.7(a)(2)

The DPG Environmental Training Director is responsible to ensure that each employee has completed all of the RCRA training required for his or her specific job. As such, this person must be familiar with RCRA training requirements as well as the specific requirements of the DTTF Permit including this Training Plan. The Training Director arranges for qualified instructors, schedules training, and ensures the quality of instruction. The Training Director ensures that all training is documented and that documentation is available for review.

1.3 EMERGENCY RESPONSE TRAINING: 40 CFR 264.16(a)(3)

Specified DPG personnel are trained to respond properly to emergency situations as described in the DTTF Contingency Plan (Attachment 3-7). All DTTF personnel must be familiar with the Contingency Plan, be able to identify emergency situations, respond properly, and notify emergency response personnel.

2.0 TRAINING PROGRAM: 40 CFR 264.16(a)(1); R315-8-2.7(a)(1); R315-8-2.7(d)(3)

Deleted: October

Deleted: 2007

The DTTF training program is designed to provide DTTF personnel with sufficient training to perform their RCRA-related job functions. DTTF personnel responsibilities are outlined in Section 2.1. Specific training topics are described in Section 2.2.

2.1 PERSONNEL RESPONSIBILITIES: 40 CFR 264.16(d)(1) and (2)

Training objectives are determined based upon an individual's job responsibilities. Job functions related to DTTF permit compliance include:

- DTTF Site Manager: This individual is responsible for overall operations at DTTF. Specific RCRA responsibilities include:
 - Prepare and review DTTF operating procedures (including SOP DP-0000-H-100),
 - Ensure personnel safety,
 - Ensure personnel training,
 - Ensure facility security,
 - Ensure that waste is correctly characterized for acceptance,
 - Oversee inspections of the facility to include inspections of waste containers,
 - Maintain the official record of Destruct Orders/Destruct Certificates,
 - Ensure that generated ash and scrap metal is disposed of properly,
 - Document all other operations as required,
 - Ensure preparation for emergencies, and
 - Ensure appropriate response to emergencies.
- DTTF Site Operators: These individuals report to the Site Manager. Their specific RCRA responsibilities include:
 - Ensure personnel safety,
 - Assist with waste acceptance,
 - Package waste,
 - Inventory waste,
 - Inspect the facility, including waste containers,
 - Document operations,
 - Ensure facility security, and
 - Respond to emergencies.
- Inspection Personnel: These are individuals designated by the DTTF Site Manager to inspect the DTTF range and any equipment associated with it, such as waste containers.
- Emergency Coordinators: These individuals are DPG personnel listed in Attachment 3-7 of this Permit. Their specific RCRA responsibilities include:
 - Coordinate response personnel in case of emergency, and
 - Notify State of Utah in case of DTTF emergency action.
- DEP Permit Coordinator: This individual is the DPG Directorate of Environmental Programs (DEP) Permitting and Compliance Coordinator. Specific DTTF responsibilities include:

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<#>Emergency Response Support
Personnel: These individuals include the
DPG Fire Department personnel and DPG
Chemical Accident/Incident Response
and Assistance (CAIRA) personnel. Their
specific RCRA responsibilities include:¶
¶
<#>Respond to emergencies at the DTTF
range, and¶
<#>Coordinate emergency response
activities with the DTTF Emergency
Coordinator.¶

- Review at least annually and update permit documentation as necessary,
- Communicate permit requirements to DTTF personnel, and
- Ensure compliance with permit requirements at the DTTF facility.

2.2 TRAINING REQUIREMENTS

RCRA training is provided for each individual such that they understand and perform their RCRA-related responsibilities as outlined in Section 2.1. The Training Director must approve all training activities. All training must be documented as described in Section 4.

DTTF RCRA-related training may include one or more specific topics depending upon the individual(s) being trained. Table 1 indicates the training requirements for each specific job function. Training topics are outlined below:

- RCRA Compliance: Overview of RCRA requirements and specific hazardous waste management procedures
- Permit Overview: Overview of DTTF permit requirements for waste acceptance, waste analysis, security, preparedness, etc.
- Operating Records: General and job-specific documentation and recording requirements
- Waste Characterization: Procedures for identification and characterization of propellant, explosive, or pyrotechnic (PEP) waste for acceptance into DTTF (Attachment 3-2, Waste Analysis Plan)
- Waste Receipt: Procedures for waste acceptance and receipt into DTTF (Attachment 3-2, Waste Analysis Plan)
- Inspections: Procedures for performing and documenting DTTF inspections for RCRA compliance (Attachment 3-4, Inspections)
- Emergency Equipment: Procedures for the use, maintenance and inspection of emergency response equipment (Attachment 3-6, Preparedness and Prevention)
- Emergency Response and Contingency Plans: Procedures to be implemented in the event of fire, explosion, or unplanned release of hazardous materials into the environment are contained in Attachment 3-7, Contingency Plan.

Note: Both a Fire Department and a Hazardous Materials (HAZMAT) Team are located at DPG and perform emergency response for the entire installation. They receive training to allow them to handle emergency situations, especially potential emergency situations that are unique to DPG, including chemical agent. The DTTF Manager will supply support personnel with site-specific information regarding potential hazards at the facility.

<p>Table 1. DTTF RCRA Training Requirements</p>

Deleted: October

Deleted: 2007

DTTF RCRA Training Requirement	Site Manager	Site Operators	Inspection Personnel	Emergency/Alternate Coordinators	Emergency Response Support Personnel ^b	DEP Permit Coordinator
Explosives handling	X	X	X			
RCRA Compliance ^a	X	X	X	X		X
Permit Overview ^a	X	X	X	X		X
Operating Records	X	X	X	X		X
Waste Characterization	X	X	X			X
Waste Receipt	X	X	X			X
Waste Inspections	X	X	X			X
Emergency Equipment	X	X	X	X		X
Emergency Response and Contingency Plans ^a	X	X	X	X	X	X
^a Annual refresher required						
^b Support personnel will be provided with a copy of the Contingency Plan (Attachment 3-7) for review						

3.0 **IMPLEMENTATION OF THE TRAINING PROGRAM: 40 CFR 264.16(b); R315-8-2.7**

Initial and continuing training for DTTF personnel may be accomplished by a combination of classroom instruction, computer-based instruction, video-based instruction, skills demonstration, or on-the-job-training. Experienced peers or supervisors may provide on-the-job training if it is approved and documented by the Training Director.

3.1 **INITIAL TRAINING**

Explosives handling personnel must be trained and receive ammunition certification prior to performing permit-related activities. This training is provided by the U.S. Naval Explosive Ordnance Disposal (EOD) Technology Division or equivalent.

Initial RCRA training includes the components listed in Table 1. DTTF personnel must fulfill the initial RCRA training requirements within 6 months of starting permit-related activities. Employees may not work unsupervised until initial training is complete.

3.2 **CONTINUING TRAINING**

Table 1 indicates which training components are to be provided on an annual basis. Required annual training will be received each calendar year. The Permittee may provide training in addition to that outlined in Table 1 to ensure that all personnel understand and comply with Permit requirements.

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4.0 TRAINING DOCUMENTATION: 40 CFR 264.16(d); R315-8-2.7(d) and (e)

The Training Director maintains training documentation. Section 4.1 describes the training plan documentation requirements. Section 4.2 describes employee training documentation requirements.

4.1 TRAINING PLAN

The DEP Permit Coordinator and DTTF Site Manager maintain current copies of the DTTF Training Plan. The DEP Permit Coordinator is responsible for an annual review of this training plan (40 CFR Part 264.16, R315-8-2.6). Updates to this plan may be required as a result of changes involving regulations, waste type, operations, techniques, equipment, or the facility-specific emergency contingency plan procedures.

4.2 EMPLOYEE TRAINING RECORDS

Initial training documentation for non-military explosives handling personnel is maintained by the Site Manager.

The Training Director maintains training records for initial and ongoing RCRA training. The DTTF Site Manager may also maintain copies of training records. Non-RCRA training may be maintained in other DPG locations such as the Safety Office or Surety Office. Original training records for RCRA compliance will include:

- Name of employee,
- Job title,
- Training and experience requirements,
- Applicable pre-employment training and education records,
- Required initial and continuing training, and
- Record of completion of training and date of completion.

5.0 REFERENCES

Utah Administrative Code (UAC) R315-3, Application and Permit Procedures for Hazardous Waste Treatment, Storage, and Disposal Facilities.

UAC R315-8, Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities.